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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:  
  
PG&E CORPORATION,  
  
Debtor.  
  
Tax I.D. No. 94-3234914

Case Nos. 19-30088  
19-30089

Chapter 11

**STATEMENT OF MARIN CLEAN  
ENERGY IN SUPPORT OF MOTION OF  
DEBTORS PURSUANT TO 11 U.S.C. §  
105(a), 363(b), AND 507(a)(7) AND FED. R.  
BANKR. P. 6003 AND 6004 FOR INTERIM  
AND FINAL ORDERS (I) AUTHORIZING  
DEBTORS TO (A) MAINTAIN AND  
ADMINISTER CUSTOMER PROGRAMS,  
INCLUDING PUBLIC PURPOSE  
PROGRAMS, AND (B) HONOR ANY  
PREPETITION OBLIGATIONS  
RELATING THERETO; AND (II)  
AUTHORIZING FINANCIAL  
INSTITUTIONS TO HONOR AND  
PROCESS RELATED CHECKS AND  
TRANSFERS; RESERVATION OF  
RIGHTS**

In re:  
  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
  
Debtor.  
  
Tax I.D. No. 94-0742640

Hearing

Date: January 31, 2019  
Time: 10:00 a.m.  
Judge: Honorable Dennis Montali  
Dept.: 17

Creditor and party-in-interest Marin Clean Energy ("MCE") submits this statement in support of the *Motion of the Debtors Pursuant to 11 U.S.C. § 105(a), 363(b), and 507(a)(7) and Federal Rules of Bankruptcy Procedure 6003 and 6004 for Interim and Final Orders (I)*

1 *Authorizing Debtors to (A) Maintain and Administer Customer Programs, Including Public*  
2 *Purpose Programs, and (B) Honor Any Prepetition Obligations Relating Thereto; and (II)*  
3 *Authorizing Financial Institutions to Honor and Process Related Checks and Transfers* [Dkt. 16]<sup>1</sup>  
4 (the “Motion”).

5 MCE, California’s first community choice aggregator (“CCA”), is a not-for-profit public  
6 agency that began service in 2010 with the goals of providing cleaner power at stable rates to its  
7 customers, reducing greenhouse emissions, and investing in targeted energy programs that support  
8 communities’ energy needs. MCE is a load-serving entity supporting approximately 1,000 MW  
9 peak load, and provides electricity generation services to more than 1.1 million people in 33  
10 communities across four Bay Area counties. Pursuant to California law, debtor Pacific Gas and  
11 Electric Company (together with PG&E Corporation, the “Debtors”) is responsible for metering,  
12 billing and delivering electricity to MCE’s customers, collecting payments from MCE’s customers,  
13 and remitting these funds to MCE.

14 MCE joins in the pleadings filed by other CCAs in support of the relief requested in the  
15 Motion, including, without limitation, *Sonoma Clean Power Authority’s Statement of Support for*  
16 *Debtors’ Public Programs Motion and Reservation of Rights* [Dkt. 66]. MCE separately files this  
17 Statement to confirm its understanding, based on communications with the Debtors, that the MCE  
18 Programs (as defined below) constitute Public Purpose Programs (as defined in the Motion).

19 Specifically, MCE administers gas and electricity energy efficiency programs in its service  
20 area pursuant to, *inter alia*, CPUC Decision Nos. 14-10-046 and 18-05-041 (the “MCE Programs”).  
21 These CPUC decisions require PG&E to remit public purpose program funds collected by PG&E to  
22 MCE, with such funds used by MCE to implement the MCE Programs. Similar to the Debtors,  
23 MCE has also received authorization from the CPUC for the MCE Programs, which include  
24 residential programs, commercial programs, industrial programs, agricultural programs, and other  
25 programs, such as the Energy Savings Assistance Program. Therefore, as with the other Public  
26 Purpose Programs described in the Motion, California statutes and regulations mandate that the  
27 funds for the MCE Programs be set aside for the express purpose of funding these programs. *See*

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<sup>1</sup> All docket references are to the docket in *In re PG&E Corporation*, Case No. 19-30088.

1 Dkt. 16, at 32:3-9. As such, MCE asserts that the relief sought in the Motion with respect to the  
2 Public Purpose Programs extends to the MCE Programs. MCE expressly reserves all rights to  
3 object to any modification of the relief requested in the Motion that would exclude the MCE  
4 Programs from the Public Purpose Programs or would otherwise jeopardize PG&E's continued  
5 performance of its obligations related to the MCE Programs.

6  
7 Dated: January 30, 2019

**MINTZ LEVIN COHN FERRIS GLOVSKY AND  
POPEO, P.C.**

/s/ Abigail V. O'Brient

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